

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	
)	
Plaintiff,)	CIVIL ACTION FILE
v.)	NO. 1:22-CV-01181-JPB
)	
RED ROOF INNS, INC.; and)	
FMW RRI I, LLC.)	
)	
Defendants.		

**DEFENDANT FMW RRI I, LLC'S OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST INTERROGATORIES**

COMES NOW FMW RRI I, LLC(hereinafter "FMW" or "Defendant), a Defendant in the above-captioned civil action, and hereby responds to Plaintiffs' First Interrogatories to Defendant FMW RRI I, LLC as follows:

PRELIMINARY STATEMENT

1. The following Responses are based upon information presently available to Defendant, which Defendant believes to be correct. These Responses are made without prejudice to its right to utilize subsequently discovered facts.

2. No incidental or implied admissions of fact by Defendant is made by the Responses below. The only admissions are express admissions. The fact that Defendant has responded to any Requests herein may not be properly taken as an admission that Defendant accepts or admits the existence of any facts set forth or assumed by such Requests, or that such Responses constitute admissible evidence. The fact that Defendant has responded to part or all of the Requests is not

11.

Please identify any and all documentary or other tangible evidence, not previously identified or produced, which you believe demonstrates and/or supports facts relevant to Plaintiff's claims, any relevant fact, liability or damages, and any defenses in this case.

RESPONSE: Defendant objects to this Interrogatory to the extent that it seeks information or documentation protected from disclosure pursuant to attorney client privilege and/or work product doctrine and/or was made in anticipation of litigation and/or exceeds the permissible scope of discovery.

Subject to and without waiving these objection, Defendant FMW did not operate or manage the Norcross Red Roof and has no knowledge responsive to this Interrogatory.

12.

Please identify each and every person who was employed at or worked at the Hotel, including subcontractors and independent contractors, from 2007 through 2012, and for each such person, please state their job title, provide all last known contact information (phone number, email, mailing address, etc.), and state whether each such person is still employed by the Hotel currently.

RESPONSE: Defendant objects to this Interrogatory as over-burdensome, overbroad and not tailored to the subject of this lawsuit because it is not limited to a specific subject matter and is unrelated to the facts of the case. As such, this Interrogatory is not reasonably calculated to the lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant FMW did not operate or manage the Norcross Red Roof and has no knowledge responsive to this Interrogatory.

Respectfully submitted this 19th day of August, 2022.

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